

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

CALEDONIAN BANK LTD.,  
CALEDONIAN SECURITIES LTD.,  
CLEAR WATER SECURITIES, INC.,  
LEGACY GLOBAL MARKETS S.A., and  
VERDMONT CAPITAL, S.A.

Defendants.

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: Case No. 15-cv-894  
: (WHP)(JLC)

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AGAINST  
DEFENDANTS CLEAR WATER SECURITIES, INC.  
AND LEGACY GLOBAL MARKETS S.A.**

PLEASE TAKE NOTICE THAT upon the Declaration of Richard E. Simpson dated November 2, 2015, the Exhibits thereto, a Certificate of Default (ECF No. 125), and upon all prior proceedings herein, Plaintiff Securities and Exchange Commission will move this Court for default judgment against Defendants Clear Water Securities, Inc. and Legacy Global Markets S.A. pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, Rule 55.2(b) of the Local Rules of the United States District Court for the Southern District of New York, and Rule VII of the Court's Individual Practices.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, are due by November 30, 2015 and reply papers are due by December 7, 2015.

Dated: Washington, D.C.  
November 2, 2015

Respectfully submitted,

Local Counsel:

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Commission  
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/s/ Richard E. Simpson  
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**CERTIFICATE OF SERVICE**

I certify that on November 2, 2015, I electronically filed the foregoing MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS CLEAR WATER SECURITIES, INC. AND LEGACY GLOBAL MARKETS S.A. using the CM/ECF system, which will send notification of such filing to counsel for Defendants Caledonian Bank Ltd., Caledonian Securities Ltd. and Verdmont Capital, S.A. at the following addresses:

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Bank Ltd. and Caledonian Securities  
Ltd.

In addition, I certify that on November 2, 2015, I served the MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS CLEAR WATER SECURITIES, INC. AND LEGACY GLOBAL MARKETS S.A. on Defendants Clear Water Securities, Inc. and Legacy Global Markets S.A. by international courier at the following address:

Clear Water Securities, Inc.  
Caye Bank Building  
Second Floor  
Coconut Drive  
San Pedro Ambergris Caye  
Belize

Legacy Global Markets S.A.  
Caye Bank Building  
Second Floor  
Coconut Drive  
San Pedro Amergris Caye  
Belize

Richard E. Simpson  
Richard E. Simpson